

REMARKS

Claims 1 and 3-15 are pending in this patent application. Claims 9-15 are new claims that were added in the Amendment submitted 10/28/2004. This RESPONSE TO NOTICE OF NON-RESPONSIVE AMENDMENT points out the patentable novelty of the newly-added claims 9-15. Further examination and reconsideration in view of the claims, remarks, and arguments set forth below is respectfully requested.

NEW CLAIMS 9-15

New Claims 9-15 are neither anticipated nor obvious in view of the cited references (William D. Heavlin et al. "Columnwise Construction of Response Surface Designs", H.P. Wynn "The sequential generation of D-optimum experimental designs", Schank et al. "Introduction to Microelectronics Manufacturing and Markets", Sacks et al. "Design and Analysis of Computer Experiments", Heavlin et al. "Dual Space Algorithms for Designing Space-Filling Experiments", Heavlin U.S. Patent No. 6,366,822, and Heavlin U.S. Patent No. 6,708,073).

Independent Claim 9 recites the limitations "creating ***a causal network diagram*** for said determined plurality of critical factors", "transforming said ***causal network diagram into a causal map***", and "***calculating map-based***

coefficients for a matrix *A* as ***a function of said causal map***" emphasis added.

These cited limitations are found in Dependent Claim 8. In the Office Action mailed 6/28/2004, there was no rejection of Dependent Claim 8 that was based on the argument that the cited references taught, motivated, or suggested the invention recited in Claim 8. Therefore, it is respectfully asserted that cited references do not teach, motivate, or suggest the present invention as recited in Independent Claim 9. Thus, it is respectfully submitted that Independent Claim 9 is not anticipated by and is patentable over the cited references and is in condition for allowance.

Dependent Claims 10-15 are dependent on allowable Independent Claim 9, which is allowable over the cited references. Hence, it is respectfully submitted that Dependent Claims 10-15 are patentable over the cited references for the reasons discussed above.

The Claims 1 and 3-8 are patentable for reasons discussed in the Amendment submitted 10/28/2004

CONCLUSION

It is respectfully submitted that the above claims, arguments and remarks overcome all rejections. All remaining claims (Claims 1 and 3-15) are neither anticipated nor obvious in view of the cited references. For at least the above-presented reasons, it is respectfully submitted that all remaining claims (Claims 1 and 3-15) are in condition for allowance.

The Examiner is urged to contact Applicant's undersigned representative if the Examiner believes such action would expedite resolution of the present Application.

Please charge any additional fees or apply any credits to our PTO deposit account number: 23-0085.

Respectfully submitted,

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